

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
BAY STATE GAS COMPANY  
D.T.E. 01-81**

Respondent: Timothy Newhard

REQUEST: Bay State Gas Company to the Attorney General -- First Set

DATE: April 25, 2002

REQUEST BSG-AG-1: Please provide a detailed description of Mr. Newhard's experience in the area of financial derivatives and risk management. Include any relevant work experience and copies any prefiled testimony previously prepared by Mr. Newhard addressing financial derivatives and/or risk management.

RESPONSE: Mr. Newhard's experience in the area of financial derivatives and risk management is based on his education and his twenty years of experience in the areas of energy regulation and finance. Mr. Newhard's academic experience includes his MBA with concentrations in finance and economics. His education also includes the courses and testing done in preparation for passing the Chartered Financial Analyst's exams. Mr. Newhard twenty years of experience in the energy and telecommunications fields includes all aspects of risk management and cost minimization for service provided to utility customers.